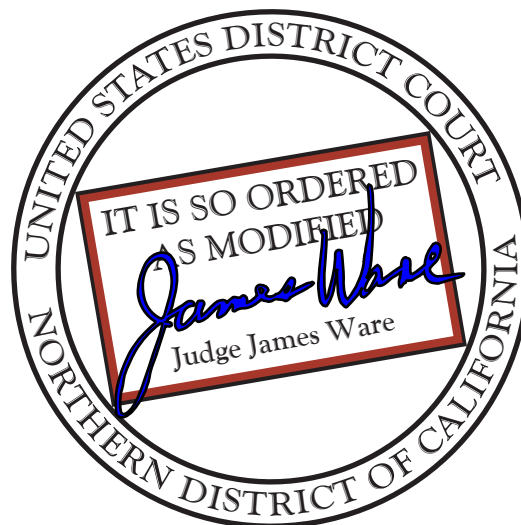


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 Vinod Khosla, Kenneth Levy and
 William R. Stensrud



UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

In re JUNIPER NETWORKS, INC.
 SECURITIES LITIGATION

CASE NO.: C06-04327-JW

This Document Relates To:

All Actions

**STIPULATION AND
 [PROPOSED] ORDER FOR
 SHORTENED TIME FOR
 HEARING JUNIPER
 DEFENDANTS' MOTION TO
 CONSOLIDATE RELATED
 CASES**

THE NEW YORK CITY EMPLOYEES'
 RETIREMENT SYSTEM, THE
 TEACHERS' RETIREMENT SYSTEM OF
 THE CITY OF NEW YORK, THE NEW
 YORK CITY FIRE DEPARTMENT
 PENSION FUND, THE NEW YORK CITY
 POLICE PENSION FUND, THE NEW
 YORK CITY POLICE SUPERIOR
 OFFICERS' VARIABLE SUPPLEMENTS
 FUND, THE NEW YORK CITY POLICE
 OFFICERS' VARIABLE SUPPLEMENTS
 FUND, THE NEW YORK CITY
 FIREFIGHTERS' VARIABLE

CASE NO.: CV-08-0246-JW

STIPULATION AND [PROPOSED] ORDER RE
 BRIEFING ON MOTION TO CONSOLIDATE
 RELATED CASES
 CASE No. C06-04327-JW AND
 CASE No. CV-08-0246-JW

1 SUPPLEMENTS FUND, AND THE NEW)
YORK CITY FIRE OFFICERS' VARIABLE)
2 SUPPLEMENTS FUND, AND THE NEW)
YORK CITY TEACHERS' RETIREMENT)
3 SYSTEM OF THE CITY OF NEW YORK)
VARIABLE ANNUITY PROGRAM,)

4)
Plaintiffs,)

5)
v.)

6 LISA C. BERRY,)

7)
Defendant.)
8)
9)
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28 STIPULATION AND [PROPOSED] ORDER RE
BRIEFING ON MOTION TO CONSOLIDATE
RELATED CASES
CASE No. C06-04327-JW AND
CASE No. CV-08-0246 -JW

1 WHEREAS, defendant Juniper Networks, Inc. and individual defendants Scott
2 Kriens, Pradeep Sindhu, Marcel Gani, Robert Calderoni, Kenneth Goldman, William R.
3 Hearst, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud
4 (collectively, the "Juniper Defendants") filed a Motion to Consolidate Related Cases
5 ("Motion to Consolidate") on September 16, 2008;

6 WHEREAS, the above-captioned cases are currently scheduled for a case
7 management conference on October 6, 2008, at which the parties will need to address matters
8 including, but not limited to, discovery scheduling, initial disclosures, and scheduling for a
9 class certification motion, and a decision on the Motion to Consolidate has bearing on those
10 issues;

11 WHEREAS, the parties therefore agree that the Motion to Consolidate should also be
12 considered at the same as the case management conference on October 6, 2008, and the
13 parties have agreed to an expediting briefing schedule to accomplish this;

14 NOW THEREFORE, the parties hereby stipulate, and request that the Court order, as
15 follows:

16 1. Plaintiff's opposition to the Motion to Consolidate shall be filed by
17 **September 22, 2008.**

18 2. Any responses of Lisa Berry or Ernst & Young to the Motion to Consolidate,
19 whatever those responses may be, shall be filed by **September 24, 2008;**

20 3. If Plaintiff chooses to file a response to Lisa Berry's or Ernst & Young's
21 responses, Plaintiff shall file such response by **September 26, 2008;**

22 4. The Juniper Defendants shall file their reply in support of the Motion to
23 Consolidate by **September 26, 2008;** and

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5. A hearing on the Motion to Consolidate shall be held
on **October 6, 2008 at 9 a.m.** follow by a Case Management Conference at 10 a.m.

IT IS SO STIPULATED.

DATED: September 17, 2008

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

/s/ Steven Guggenheim

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Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth
Levy and William R. Stensrud*

DATED: September 17, 2008

BARBARA J. HART
DAVID C. HARRISON
LOWEY DANNENBERG COHEN & HART, P.C.

/s/ David C. Harrison

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1 DATED September 17, 2008

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9 DATED September 17, 2008

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JAMES N. KRAMER
NANCY E. HARRIS
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ORRICK, HERRINGTON & SUTCLIFFE LLP

13 /s/ Nancy E. Harris

NANCY E. HARRIS

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Counsel for Defendant Lisa C. Berry

18 * * *

19 IT IS SO ORDERED AS MODIFIED.

20 Dated: September 18, 2008


The Honorable JAMES WARE